

JTW: 07.20.23
KSC: USAO2019R00156

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

MICHAEL A. ZIMMERMAN, JR.,
SARAH E. RAHIM,
WOODROW BEAHM, JR.
JAMES COLLINS,
THOMAS COLLINS,
LISA COMPTON,
RICHARD DRURY,
MICHAEL SWAGGERTY,
WESLEY WATSON,
KENNETH WILLS,
and
MICHAEL ZIMMERMAN, SR.,

Defendants.

CRIMINAL NO. GLR-22-0124

(Conspiracy to Distribute and Possess
With Intent to Distribute Controlled
Substances, 21 U.S.C. § 846; Forfeiture,
21 U.S.C. § 853; 18 U.S.C. § 2461; Fed.
R. Crim. P. 32.2(a))

SUPERSEDING INDICTMENT

COUNT ONE

(Conspiracy to Distribute and Possess With Intent to Distribute Controlled Substances)

The Grand Jury for the District of Maryland charges that:

Beginning at least in or about January 2021, and continuing through in or about April 2022,
in the District of Maryland, the defendants,

MICHAEL A. ZIMMERMAN, JR.,
SARAH E. RAHIM,
WOODROW BEAHM, JR.
JAMES COLLINS,
THOMAS COLLINS,
LISA COMPTON,
RICHARD DRURY,
MICHAEL SWAGGERTY,
WESLEY WATSON,
KENNETH WILLS,

and
MICHAEL ZIMMERMAN, SR.,

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to knowingly, intentionally, and unlawfully distribute and possess with intent to distribute oxycodone, also known as Oxycontin, Xtampza, Percocet, Roxicodone, Roxicet, and Endocet, a Schedule II controlled substance, amphetamine, also known as Adderall, a Schedule II controlled substance, and buprenorphine, also known as suboxone, a Schedule III controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

21 U.S.C. § 846

18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendants that the United States will seek forfeiture as part of any sentence in accordance with 28 U.S.C. § 2461(c) and the other statutes cited herein, in the event of the Defendants' convictions.

Narcotics Forfeiture

2. Pursuant to 21 U.S.C. § 853(a), upon conviction of an offense in violation of the Controlled Substances Act, as alleged in Count One, the Defendants convicted of such offenses, shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses; and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offenses.

Property Subject to Forfeiture

3. The property to be forfeited includes, but is not limited to, the following:
- a. \$54,668.00 cash (seized from WILLS),
 - b. \$6,518.00 in U.S. currency (seized from COMPTON),
 - c. \$4,316.00 in U.S. currency (seized from ZIMMERMAN, Jr.),
 - d. a Lexus NX (seized from ZIMMERMAN, Jr.),
 - e. \$59,252.10 in U.S. currency (seized from BEAHM, Jr.),
 - f. \$3,800.00 in money orders (seized from BEAHM, Jr.), and
 - g. one shotgun (seized from BEAHM, Jr.).


Substitute Assets

4. Pursuant to Title 21, United States Code, Section 853(p), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the defendants up to the value of the property charged with forfeiture in the paragraphs above.

21 U.S.C. § 853
28 U.S.C. § 2461
Fed. R. Crim. P. 32.2(a)



Erek L. Barron
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Date: 7/25/23